

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

KURT CHRIST and JOANNE FIOLA,  
**Plaintiffs,**

v.

CIVIL ACTION NO.: 17-CV-11828-PBS

SANTANDER BANK N.A. and  
BRETT KILMER,  
**Defendants.**

---

**JOINT SCHEDULING STATEMENT**

**I. DISCOVERY**

The parties propose the following pre-trial schedule:

<b>Date/Deadline</b>	<b>Event</b>
November 8, 2017	Automatic disclosures to be completed by all parties.
December 15, 2017	Written discovery served, except for written discovery which becomes necessary due to information learned at deposition.
April 27, 2018	Completion of all non-expert depositions, including keeper-of-record depositions and non-party witnesses
May 15, 2018	Plaintiff to designate expert witnesses, if any, and provide expert report.
June 15, 2018	Defendants to designate expert witnesses, if any, and provide an expert report.
July 30, 2018	All expert depositions to be completed.
August 30, 2018	Deadline for filing dispositive motions, if any.

The parties find the discovery event limitations imposed by L.R. 26.1 are appropriate for this case.

**II. CERTIFICATION**

The parties report that they will confer with their clients pursuant to Local Rule 16.1(D)(3) and will independently file their Certificates of Compliance.

**III. TRIAL BY MAGISTRATE JUDGE**

The parties have not reached agreement on trial by Magistrate Judge.

**IV. SETTLEMENT**

Both parties are willing to attend mediation.

Respectfully submitted,

Plaintiffs,

KURT CHRIST and JOANNE FIOLA

By Their Attorneys,

*/s/ Christopher C. Storm*

Defendants

SANTANDER BANK, N.A. and BRETT  
KILMER

By Their Attorneys,

*/s/ Jeffrey D. Adams*

---

Edwin F. Landers, Jr., BBO #559360  
elanders@morrisonmahoney.com  
Christopher C. Storm, BBO #680782  
cstorm@morrisonmahoney.com  
MORRISON MAHONEY LLP  
250 Summer Street  
Boston, MA 02210-1181  
Phone: 617-439-7500  
Fax: 617-342-4967

---

Jeffrey D. Adams, BBO # 662697  
One Financial Center, 15th Floor  
Boston, MA 02111  
Phone: 617.918.7600  
Facsimile: 617.918.7878  
Email: jeffrey.adams@piblaw.com

Dated: October 23, 2017

### **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 23, 2017.

s/s *Christopher C. Storm*